

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

2019 FEB 20 P 2:19

UNITED STATES OF AMERICA

v.

THESSALONIE MORGAN, and

Defendants.

Case No. 3:19-CR- 22

JUDGES Varlan / Poplin

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Commit Bank Fraud – 18 U.S.C. § 1349)

The Conspiracy and its Criminal Object

1. From on or about June 20, 2018 to on or about July 1, 2018, within the Eastern District of Tennessee and elsewhere, defendants [REDACTED], THESSALONIE MORGAN, and [REDACTED] did unlawfully and knowingly combine, conspire, and agree with one another and with others both known and unknown to the grand jury, to execute a scheme and artifice to obtain money, funds, credits, assets, and other property owned by, and under the custody and control of financial institutions, the deposits of which were federally insured, by means of materially false and fraudulent pretenses, representations, and promises in violation of Title 18, United States Code, Section 1344(2).

Purpose of the Conspiracy

2. The purpose of this conspiracy was that the defendants, [REDACTED], THESSALONIE MORGAN, and [REDACTED] would and did present

and cause to be presented counterfeit credit cards from financial institutions in order to obtain merchandise and gift cards at retail stores by fraud and deceit.

Manner and Means of the Conspiracy

3. It was part of the conspiracy that defendants [REDACTED], THESSALONIE MORGAN, and [REDACTED] did travel from locations outside Tennessee to the Eastern District of Tennessee and elsewhere for the purpose of executing the fraudulent scheme.

4. It was further part of the conspiracy that members of the conspiracy would and did obtain and use, without authority, legitimate credit card account information, including account numbers which were issued by a single financial institution for a single account holder. The individual credit card account numbers were taken without authority from federally insured financial institutions, including Redstone Federal Credit Union, American Express, Bank of America, Chase Bank, and Chemical Bank & Trust, among others.

5. It was further part of the conspiracy that the stolen, legitimate credit card account information was used to create counterfeit credit cards. Typically, the stolen credit card account numbers were placed in the magnetic strip on the back of the credit cards while the front of the cards depicted a different credit card account number.

6. It was further part of the conspiracy that defendants [REDACTED], THESSALONIE MORGAN, and [REDACTED] would and did present the counterfeit credit cards to multiple retail stores located in the Eastern District of Tennessee and elsewhere, in exchange for merchandise and gift cards.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO – SEVEN
(Bank Fraud – 18 U.S.C. § 1344(2))

7. The Grand Jury realleges and incorporates by reference herein all of the allegations contained in paragraphs 2 through 6 of the Indictment, and further alleges that:

8. On or about July 1, 2018, in the Eastern District of Tennessee, the defendants identified in the chart below, knowingly executed a scheme and artifice to obtain the money, funds, credits, assets, and other property owned by, and under the custody or control of Redstone Federal Credit Union (“RFCU”), a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, by means of materially false and fraudulent pretenses and representations, to wit, by presenting counterfeit RFCU credit cards with the account numbers identified by the last four digits in the chart below at Walmart Supercenter located at 911 US-321, Lenoir City, Tennessee, in exchange for merchandise and gift cards in the amounts identified in the chart below:

Count	Defendant	Account Number	Amount
2	[REDACTED]	6119	\$106.48
3	[REDACTED]	4921	\$105.44
4	THESSALONIE MORGAN	9163	\$122.01
5	THESSALONIE MORGAN	3041	\$121.50
6	[REDACTED]	0606	\$114.09
7	[REDACTED]	2053	\$130.38

Each count being in violation of Title 18, United States Code, Section 1344(2).

COUNTS EIGHT – THIRTEEN
(Aggravated Identity Theft – 18 U.S.C. § 1028A)

9. On or about July 1, 2018, in the Eastern District of Tennessee, the defendants identified in chart below, did knowingly use, without lawful authority, a means of identification of another person, to wit, the credit card account numbers identified by the last four digits in the chart below which belonged to the identity theft victims identified in the chart below, during and in relation to a felony enumerated in 18 U.S.C. § 1028A(c), to wit, bank fraud as charged in the counts of this Indictment identified in the chart below, knowing that the means of identification belonged to another actual person:

Count	Defendant	Account	Victim	Bank Fraud Count of this Indictment
8	[REDACTED]	6119	C.D.	Count Two
9	[REDACTED]	4921	C.R.	Count Three
10	THESSALONIE MORGAN	9163	M.M.	Count Four
11	THESSALONIE MORGAN	3041	R.S.	Count Five
12	[REDACTED]	0606	E.C.	Count Six
13	[REDACTED]	2053	W.W.	Count Seven

Each count being in violation of Title 18, United States Code, Section 1028A

A TRUE BILL:

SIGNATURE REDACTED

GRAND JURY FOREPERSON /

J. DOUGLAS OVERBEY
UNITED STATES ATTORNEY



CASEY T. ARROWOOD
ASSISTANT UNITED STATES ATTORNEY